

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Harrisonburg Division

CONSUMER FINANCIAL PROTECTION  
BUREAU; COMMONWEALTH OF  
MASSACHUSETTS; THE PEOPLE OF  
THE STATE OF NEW YORK, by LETITIA  
JAMES, Attorney General of the State of  
New York; and COMMONWEALTH OF  
VIRGINIA, *EX REL.* MARK R. HERRING,  
ATTORNEY GENERAL,

Plaintiffs,

v.

NEXUS SERVICES, INC.; LIBRE BY  
NEXUS, INC.; MICHEAL DONOVAN;  
RICHARD MOORE; and EVAN AJIN,

Defendants.

Case No.: 5:21-cv-00016-EKD

**NOTICE REGARDING DISCOVERY VENDOR**

TO THE COURT, ALL PARTIES AND THEIR COUNSEL:

PLEASE TAKE NOTICE THAT, pursuant to Paragraph 3 of Magistrate Judge Hoppe's June 6, 2022 Order for Defendants to Provide or Permit Discovery ("Order"), NEXUS SERVICES, INC.; LIBRE BY NEXUS, INC.; MICHEAL DONOVAN; RICHARD MOORE; and EVAN AJIN ("Defendants"), hereby provide notice that they have begun the onboarding process with a new ESI discovery vendor, and are currently going through the company's conflicts process.

Defendants further state that based on preliminary discussions and assessment of the number of custodians, the search terms at issue, the relevant period, and Defendants' systems,

Defendants estimate that 500 GBs of ESI would need to be collected by the discovery vendor. To be clear, this estimate does not include the databases encompassed by Paragraph 5 of the Order. Based on this figure, Defendants were informed that the discovery vendor should be able to run the agreed-upon searches and return the results to Defendants' counsel for their initial review within four to six weeks.

Dated: June 22, 2022

Respectfully submitted,

ARENTFOX SCHIFF LLP

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Nexus, Inc.; Micheal Donovan; Richard  
Moore; and Evan Ajin*